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**General Aviation
Manufacturers Association**

1400 K Street NW, Suite 801
Washington, DC 20005-2485
(202) 393-1500 • Fax (202) 842-4063

January 15, 2003

**Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW.
Washington, DC 20590-0001**

**Subject: Aging Airplane Safety; Interim Final Rule and Notices: Request
for Comments, Docket Number FAA-1999-5401 -96**

Ladies and Gentlemen:

On December 6, 2002, the subject rule and regulation was published in the Federal Register, Volume 67, beginning on page 72726. The publication announced that this interim rule is effective on December 8, 2003 and, as part of this rulemaking, FAA said "...it continually seeks to find ways to implement its rules at lower cost without compromising safety. To this end, we solicit comments from interested parties on how implementation costs for this rule could be further reduced."

The General Aviation Manufacturers Association (GAMA) has reviewed the subject rule and advisory circulars and finds that the rule is of very far reaching complexity and raises many unquantified concerns for the industry. As a result, it has the potential for adverse impact on maintenance and inspection program development and execution costs. In the rule Preamble, FAA notes that industry has made significant contributions to the development of this "significant and controversial rulemaking action." In fact, for many years preceding the issuance of the April 2, 1999 NPRM on this matter, the FAA, operators and manufacturers have worked together, mainly under the FAA's Aging Airplane Program, to address aging aircraft issues. FAA further states in the Preamble that the rule may be amended in light of comments received and invites additional comments on both the rule and the advisory circulars.



GAMA and its members have been reviewing this rule and related advisory circulars since publication in the Federal Register. GAMA finds that this rule and advisory circulars raise complex and far reaching issues that must be more clearly understood before substantive comments can be made to the docket. There has been insufficient time and opportunity to interact with experts on this subject in both industry and FAA. Because GAMA desires to develop and provide substantive comments to assist the FAA achieve its objective for improving safety and reducing the cost of rule implementation, GAMA respectfully requests a 90 day extension of the comment period for the Interim Final Rule and Notices on Aging Airplane Safety, docket number FAA-1999-5401, so that it can develop and provide to the FAA a substantive set of comments.

GAMA is a national trade association headquartered in Washington, DC representing manufacturers of general aviation aircraft, engines, avionics and related equipment. GAMA's members also operate fleets of aircraft, fixed based operations at many airports, and pilot training and maintenance training facilities across the United States. For additional information, visit GAMA's web site at www.generalaviation.org.

Please contact me if you have any questions about this request for an extension of the comment period.

Very truly yours,

GENERAL AVIATION MANUFACTURERS ASSOCIATION

A handwritten signature in black ink, appearing to read "W. H. Schultz", with a stylized flourish at the end.

William H. Schultz
Vice President-Engineering and Maintenance

Copy: Mr. Frederick Sobeck
Airplane Maintenance Division, AFS-304
Flight Standards Service
Federal Aviation Administration
800 Independence Avenue, SW.
Washington, DC 20591